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CLERK OF DISTRICT COURT  
DISTRICT OF NEW HAMPSHIRE  
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UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW HAMPSHIRE

PAUL MARAVELIAS,  
*Plaintiff,*

v.

JOHN J. COUGHLIN, in his individual and  
official capacities, GORDON J. MACDONALD,  
in his official capacity as Attorney General of  
New Hampshire, PATRICIA G. CONWAY, in  
her official capacity as Rockingham County  
Attorney, TOWN OF WINDHAM, *ex rel.*  
WINDHAM POLICE DEPARTMENT, and  
GERALD S. LEWIS, in his official capacity as  
Chief of Police.

*Defendants.*

Civil No. 1:19-CV-143(SM)

JURY TRIAL DEMANDED

**PLAINTIFF'S OPPOSITION  
TO DEFENDANT GORDON J.  
MACDONALD'S MOTION TO  
DISMISS AMENDED COMPLAINT**

NOW COMES Paul Maravelias ("Plaintiff") and respectfully submits the within Objection to Defendants' Motion to Dismiss. In support thereof the Plaintiff states as follows:

1. All Defendants have joined in Defendant Gordon J. MacDonald's 5/17/19 Motion to Dismiss this case for lack of subject matter jurisdiction pursuant to F.R.C.P 12(b)(1) under the *Rooker-Feldman* doctrine.

2. The *Rooker-Feldman* doctrine does not bar any aspect of this suit. The instant action is amply distinguishable from cases to which said doctrine is applicable.

3. In further support, Plaintiff incorporates by reference and repeats herein his contemporaneously filed *Memorandum of Law in Support of Plaintiff's Opposition to Defendant Gordon J. MacDonald's Motion to Dismiss Amended Complaint*.

WHEREFORE, Plaintiff Paul Maravelias respectfully requests this Honorable Court:

- A. Deny Defendant Gordon J. MacDonald's 5/17/19 Rule 12(b)(1) Motion to Dismiss joined by all co-defendants;
- B. Hold a Hearing on this matter; and
- C. Grant any further relief as may be deemed just and proper.

Dated: June 3<sup>rd</sup>, 2019

Respectfully submitted,

PAUL J. MARAVELIAS,

*in propria persona*

/s/ Paul J. Maravelias, pro se

**Paul J. Maravelias**

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**CERTIFICATE OF SERVICE**

I, Paul Maravelias, certify that a timely provided copy of this document is being sent on this date to all counsel of record for the Defendants pursuant to the rules of this Court.

/s/ Paul J. Maravelias

**Paul J. Maravelias**

Dated: June 3<sup>rd</sup>, 2019